

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

GREATGIGZ SOLUTIONS, LLC,

Plaintiff

v.

**MAPLEBEAR INC. D/B/A
INSTACART**

Defendant

Case No. 6:20-cv-737-ADA

JURY TRIAL DEMANDED

**PLAINTIFF’S UNOPPOSED MOTION TO EXTEND THE DEADLINES FOR PLAINTIFF’S
RESPONSE AND DEFENDANT’S REPLY
TO DEFENDANT’S MOTION TO DISMISS**

GreatGigz Solutions, LLC (“Plaintiff”) moves the Court for an extension of the deadline for Plaintiff to file a response and Defendant to file a reply to Defendant’s Motion to Dismiss (“Motion”). Defendant filed its Motion on October 27, 2020 [Dkt. No. 11]. Plaintiff’s response to the Motion is currently due on December 4, 2020. Pursuant to the Court’s November 19, 2020 Standing Order Regarding Venue and Jurisdictional Discovery Limits for Patent Cases and to allow the Parties to address venue discovery related to the allegations set forth in Defendant’s motion to transfer to the Northern District of California, the Parties have stipulated and agreed to extend the deadline for Plaintiff to respond to the Motion to be up to two weeks after the completion of venue discovery, and to extend the deadline for Defendant to reply to be up to two weeks after Plaintiff’s response. Venue discovery will be completed before or on April 27, 2021, six months after the filing of Defendant’s Motion, and the parties will notify the Court when such discovery is completed. Plaintiff agrees that it will not rely on this extension in any way as a reason to deny the Motion. This extension does not extend Plaintiff’s

time to amend its Original Complaint for Patent Infringement under Rule 15(a)(1) of the Federal Rules of Civil Procedure. This motion and agreement between the Parties should not be construed as a waiver of any other rights or defenses.

Accordingly, as stipulated and agreed by the Parties, Plaintiff respectfully requests the deadline for Plaintiff's response to Defendant's Motion to be up to two weeks after the completion of venue discovery, and that the deadline for Defendant's reply be up to two weeks after Plaintiff's response. Venue discovery will be completed before or on April 27, 2021, six months after the filing of Defendant's Motion, and the parties will notify the Court when such discovery is completed.

Date: December 4, 2020

Respectfully submitted,

/s/ Thomas G. Fasone III

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